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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
12

13 IN RE: HIGH-TECH EMPLOYEE
14 ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS
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**EXHIBIT 15 TO DECLARATION OF
LIN W. KAHN IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' SUPPLEMENTAL
MOTION FOR CLASS
CERTIFICATION**

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
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5 IN RE: HIGH-TECH EMPLOYEE)
6 ANTITRUST LITIGATION)
7) No. 11-CV-2509-LHK
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9 ALL ACTIONS.)

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12 VIDEO DEPOSITION OF LASZLO BOCK
13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
14 March 27, 2013

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16 Reported by: Anne Torreano, CSR No. 10520
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11:16:49 1 BY MS. SHAVER:

11:16:49 2 Q. Was it in use at the time you joined the
11:16:51 3 company in 2006?

11:16:52 4 A. It was.

11:16:52 5 Q. Okay. And you mentioned that you no longer
11:16:56 6 use that; right?

11:16:57 7 A. Well, we no longer use what you described, and
11:17:00 8 I'm not sure we ever used what I thought I heard you
11:17:05 9 describing.

11:17:05 10 So what I specifically meant was we no longer
11:17:08 11 have a distinction between T jobs, which are technical
11:17:12 12 jobs; O jobs, which are ops jobs; E jobs -- sorry, S
11:17:16 13 jobs, which are sales jobs; and E jobs, which are
11:17:19 14 everything else. We don't have that distinction
11:17:20 15 anymore. We do still have, sort of, job grades, but
11:17:25 16 even those are not all used.

11:17:26 17 Q. Okay. Well, we'll circle back to this when we
11:17:28 18 get documents from counsel.

11:17:30 19 Are you familiar with the term "internal
11:17:48 20 equity" in the compensation context?

11:17:50 21 A. Yes.

11:17:50 22 Q. And can you tell me what you understand that
11:17:52 23 term to mean?

11:17:52 24 A. In the Google context, the way we talk about
11:17:56 25 it is -- actually, we don't say "internal equity,"

11:18:01 1 really, much at Google.

11:18:02 2 In the compensation field, people talk about
11:18:04 3 internal equity, which generally means people -- you
11:18:06 4 know, pay should be fair across people.

11:18:09 5 In Google we don't actually talk about -- we
11:18:12 6 don't use the phrase "internal equity" much at all. We
11:18:15 7 instead focus in compensation on making sure, as much
11:18:18 8 as possible, compensation is tied to individual
11:18:20 9 contributions.

11:18:20 10 Q. And is it a principle of compensation in
11:18:23 11 Google that compensation should be fair?

11:18:25 12 MR. RUBIN: Objection. Form.

11:18:26 13 THE WITNESS: I'm not sure what you mean by
11:18:29 14 "fair."

11:18:30 15 BY MS. SHAVER:

11:18:30 16 Q. Well, you testified, "In the compensation
11:18:35 17 field, people talk about internal equity, which
11:18:37 18 generally means people -- pay should be fair across
11:18:42 19 people."

11:18:42 20 Is that true at Google as well?

11:18:44 21 A. So this is why I draw the distinction between,
11:18:46 22 sort of, the general compensation -- the way
11:18:48 23 compensation people look at it and the way we think
11:18:49 24 about it at Google.

11:18:50 25 At Google our view is very much that pay can

11:18:54 1 and should and does vary wildly across individuals who
11:18:57 2 are performing the same job, at the same job grade,
11:19:01 3 based on differences in their performance and
11:19:03 4 contribution.

11:19:03 5 And so at Google we actually -- and this is
11:19:07 6 why I asked about what do you mean by "fair." You
11:19:09 7 know, fairness is commonly taken to mean, you know,
11:19:12 8 well, everything's equally distributed. And when
11:19:15 9 people talk about internal equity outside of Google,
11:19:17 10 sometimes they'll say that.

11:19:18 11 Within Google we don't really care about it
11:19:20 12 being evenly distributed. We care about the very best
11:19:24 13 people getting incredibly well compensated and the very
11:19:29 14 worst people not getting much at all and having an
11:19:32 15 incredibly wide distribution across that entire range.

11:19:35 16 So there's not an equal distribution if you
11:19:37 17 measure it on a per-capita basis, but if you compare it
11:19:41 18 to individual contribution, yeah, we try to make it
11:19:44 19 fair.

11:19:44 20 Q. Would it be fair to say or accurate to say
11:19:46 21 that Google wants to reward equally performing people
11:19:50 22 equally --

11:19:51 23 MR. RUBIN: Objection. Form.

11:19:52 24 BY MS. SHAVER:

11:19:52 25 Q. -- or fairly?

1 REPORTER'S CERTIFICATE

2 I, Anne Torreano, Certified Shorthand
3 Reporter licensed in the State of California, License
4 No. 10520, hereby certify that the deponent was by me
5 first duly sworn, and the foregoing testimony was
6 reported by me and was thereafter transcribed with
7 computer-aided transcription; that the foregoing is a
8 full, complete, and true record of said proceedings.

9 I further certify that I am not of counsel or
10 attorney for either or any of the parties in the
11 foregoing proceeding and caption named or in any way
12 interested in the outcome of the cause in said
13 caption.

14 The dismantling, unsealing, or unbinding of
15 the original transcript will render the reporter's
16 certificates null and void.

17 In witness whereof, I have subscribed my name
18 this 9th day of April, 2013.

19
20 ☐ Reading and Signing was requested.

21 ☐ Reading and Signing was waived.

22 ☒ Reading and Signing was not requested.
23
24

25 _____
ANNE M. TORREANO, CSR No. 10520